

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, NICHOLAS ELEFTERAKIS,
NICHOLAS LIAKIS, and IME COMPANIONS LLC,

Defendants.

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SAFA GELARDI and IME COMPANIONS, LLC,

Third-Party Plaintiffs,

-against-

CARLOS ROA,

Third-Party Defendant.

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CARLOS ROA,

Third-Party Counter-Claimant,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
and IME COMPANIONS, LLC,

Third-Party Counter-Defendants.

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TIFFANY URIBE, hereby declares and verifies the truth of the following, under
penalty of perjury under the laws of the United States of America, pursuant to Title 28, United States
Code, Section 1746:

Case No.: 1:22-cv-1032 (PKC)(JRC)

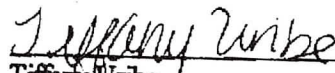
**DECLARATION OF
TIFFANY URIBE**

1. I am an independent contractor for defendant IME Companions LLC ("Companions"), and I am fully familiar with the facts set forth herein

2. I have been informed that Rebecca Roth ("Roth") has submitted an affidavit to this Court stating that I was with Mark Purificati when he allegedly approached her at a doctor's office on East 15th Street in Brooklyn on October 27, 2022. Roth is mistaken.

3. I was not at that medical office on October 27, 2022. On October 27, 2022, I worked from 8:04 A.M. until 2:29 P.M. as a speech pathologist. A redacted copy of my timesheet covering October 27, 2022, is annexed as Exhibit "A." I will gladly offer an unredacted copy of my timesheet to the Court for an *in camera* inspection. But I do not want to disclose my employer to plaintiff out of fear of retribution.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 16, 2023.


Tiffany Uribe

Sworn to before me this
16th day of March, 2023


NOTARY PUBLIC

This remote notarial act involved the use of communication technology

JONATHAN D. WARNER
Notary Public in and for New York
No. 024003765
Qualified in Nassau County
Commission Expires September 30, 2025